



10 ADMINISTRATION

Effective: 6/1/96

10.12 Evaluation of Local Agencies

Revised: 05/01/03

POLICY: Per Federal Regulation, "The State Agency shall conduct monitoring reviews of each local agency once every two years. Such reviews shall include on-site reviews of a minimum of 20 percent of the clinics in each local agency or one clinic, whichever is greater."

BACKGROUND:

The objectives of local agency performance reviews are to:

- 1) Improve and maintain quality services by evaluating the effectiveness and efficiency of program management and the provision of WIC services to participants;
- 2) Provide documentation of accountability by grantees utilizing a uniform format; and
- 3) Systematically assess compliance with Federal WIC Regulations, State WIC Program policies and procedures.

Refer to the Contract Agreement between the WIC agency and the Department of Health and Family Services for compliance with Quality Criteria. Refer to the agency's Contract Administrator or documents provided by the Division of Public Health for information regarding the Performance Based Contracting.

PROCEDURE:

A. EVALUATION TOOLS

1. The State-developed "WIC Program Self Assessment Tool" will be used for the local agency annual or biennial performance reviews. Federal and State requirements will be monitored for compliance and recommendations will be reviewed. See Policy 10.13 Technical Assistance and Follow-up for Local Agencies. Part One and Two of the Tool must be completed at least once every two years prior to the monitoring visit conducted by the Regional Office Nutrition Consultant, although it may be completed annually. Part Two of the Tool will be the main focus of the Regional Office Nutrition Consultant during the biennial monitoring visit.

B. TIME FRAMES FOR PERFORMANCE REVIEWS



1. The State-developed WIC Program Self Assessment Tool will be used for the local agency annual or biennial performance reviews. Biennial visits may begin any time after January 1 and must be completed by mid-November to complete the reports by the end of the calendar year. See Policy 10.13 Technical Assistance and Follow-up for Local Agencies.
2. Newly funded projects are subject to quarterly on-site review and assessment during its first year of operation. All tools are useful for orientation and to ensure that all areas are reviewed during that first year.

C. OPTIONS FOR STRUCTURING REVIEWS

The Regional Nutrition Consultant will determine the best option based on project need (new staff, problem areas, etc.)

1. During one calendar year, the entire WIC Program Self Assessment Tool may be reviewed.
2. Another option is to divide the sections of the WIC Program Self Assessment Tool to review the project several times during a two-year period.
3. The exception to these options relates to new projects. See B.2. above.

D. REGIONAL OFFICE NUTRITION CONSULTANT RESPONSIBILITIES

1. Regional Office Nutrition Consultants may use discretion when reviewing projects using the WIC Program Self Assessment Tool, and tailor the review process based on the:
 - a) experience of the Regional Office Nutrition Consultant
 - b) review of past monitoring visits
 - c) number of new local project staff
 - d) history of the project
 - e) training received by project staff
2. Planning for Reviews
 - a) 20 percent of the certification clinics in each project, or one clinic, whichever is greater, must be monitored.



- b) The WIC Program Self Assessment Tool will be distributed to projects at the beginning of the fiscal year (or when received from the State WIC Office) for self assessment and/or for the review process.
 - c) The Budget and Management On-Site Review - WIC and FMNP Program tool will be included in Part Two. Project staff members do not complete this Tool in advance of the review. Materials and the months to be reviewed will be identified in the cover letter to the WIC Project for review during the visit. The following documents are needed and should pertain to the current contract period:
 - (1) CARS Expenditure Reports (DMT-855)
 - (2) Approvals for Equipment Purchases
 - (3) Monthly Expenses
 - (4) Personnel Time Sheets
 - (5) Cost Allocation Plan
 - (6) Subcontracts
 - (7) Indirect Cost Plan
 - (8) Agency Financial Reports
 - d) Materials may be requested in advance of the visit to be reviewed at the regional office.
3. Reviewed at the Regional Office Before Scheduling the Visit
- a) Local project staff should complete the entire WIC Program Self Assessment Tool, (Parts One and Two), in advance of the visit and submit it to the Regional Office Nutrition Consultant for review. The exception is the Budget and Management On-Site Review - WIC and FMNP Program tool. The WIC Program Self Assessment Tool, (Parts One and Two) will serve as a starting point for the visit by establishing areas needing discussion or clarification, further review of materials, observation, or preparation of materials to support requirements or recommendations.
 - b) Project computer files may be requested on diskette for review prior to the visit.
 - c) Previous years' WIC performance review follow-up letter(s) and response(s) will be reviewed to identify all required actions to reassess.
 - d) Recurring problems brought up in technical assistance visits, regional meetings, correspondence, or from Central Office will be discussed.



- e) Composite Reports and caseload management reports will be reviewed to compare projects' statistics.
- f) Issues identified in the WIC Program Informational Materials will be reviewed during the visit.
- g) Preliminary review may include reviewing the CARS Expenditure Reports (DMT - 855) and budget.
- h) The on-site visit will be scheduled based on the above information. Materials will be requested to have available on-site for review during the visit.

4. Review at the Local Agency

- a) An Entrance Conference or introduction will be conducted with the Project Director and any other staff members the Director wants present. It is recommended that the Agency Director also attend. The Regional Office Nutrition Consultant will discuss objectives of the visit, the instruments that will be used, sections that will be reviewed, and how the assessment will be made.
- b) The on-site review will be conducted. Assessment will include: review of the Tools completed by project staff; interviews with staff to complete the Budget and Management On-Site Review- WIC and FMNP Program tool; observations; answering staffs' questions; and reviewing files. Observations may include: clinic operations, certification, nutrition education, draft issuance, and secondary education. The Tool(s) will be completed, including the verification of required areas.
- c) Determine if additional technical assistance is needed or if there appears to be potential problems in the management of the agency's budget. If the project is behind schedule with meeting the implementation of policies, it is expected that some additional technical assistance will be provided and documented. If the reviewer's work leads to any "no" answers on the Budget and Management On-Site Review-WIC and FMNP Program tool, follow-up will be needed to ensure proper project management.
- d) The Exit Conference will be conducted, and may include the same staff who attended the Entrance Conference. During the exit conference, important areas found deficient or out of compliance will be addressed, along with commendations for areas well done, general concepts, solutions for required actions, and policy clarifications, etc. If the project staff persons dispute the findings, the consultant will listen and document the explanations. A copy of the Tool(s) will be left with the agency, if requested.



5. Follow-up at the Regional Office

- a) The Regional Office Nutrition Consultant will provide a follow-up letter to the WIC monitoring or consultation within twenty (20) working days of each visit to the Project.
 - (1) Projects are required to respond to only the required actions cited in the WIC Program Self Assessment Tool, in writing to the Consultant, and within twenty (20) working days of receipt.
 - (2) If the response is not satisfactory, the Consultant will contact the project for further clarification. Additional information should be provided by the Project Director within 10 working days. When the response is finalized, a closeout letter will be sent.
- b) Copies of the WIC letters and responses will be sent to State WIC Program Office and the Milwaukee County WIC Office (Milwaukee County WIC projects only). Date and send a copy of the Budget and Management On-Site Review-WIC and FMNP Program tool to the State WIC Program Office.